

1 MONTI JORDANA LEVY, ESQ.
2 Nevada Bar No. 8158
3 WRIGHT MARSH & LEVY
4 300 S. Fourth Street, Suite 701
5 Las Vegas, NV 89101
Office: (702) 382-4004
Fax: (702) 382-4800
mlevy@wmllawlv.com
Atorneys for Defendant Brandon Cabral

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. 2:20-CR-00124-JCM-BNW
12 vs.)
13 BRANDSON CABRAL,)
14 Defendant.)

**UNOPPOSED MOTION FOR
PRE-PLEA PRESENTENCE REPORT**

17 BRANDSON CABRAL, by and through his attorney, MONTI JORDANA LEVY, of
18 WRIGHT MARSH & LEVY, respectfully moves this Honorable Court to order the Department of
19 Probation to prepare a pre-plea presentence report to assist the parties in negotiating the instant case¹.

DATED this 25th day of January, 2023.

/s/ Monti Jordana Levy
MONTI JORDANA LEVY
Attorney for Brandson Cabral

111

111

26 | //

111

¹ Defense counsel has met and conferred with the Government prior to filing this motion. The assigned AUSA has indicated that the Government will not oppose the instant motion.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Defendant Brandson Cabral is charged by Indictment with one count of Felon in Possession
3 of Firearm. The Government and Mr. Cabral's counsel have been discussing potential negotiations
4 in this matter; however, there are some areas of confusion regarding his prior criminal history and
5 the calculations of credit between state and federal offenses. Counsel believes that once a true
6 calculation of Mr. Cabral's criminal history and an accurate determination of when his sentences had
7 been completed is prepared that the parties will be able to meaningfully discuss resolving the case.

8 To ensure that Mr. Cabral has all of the information he needs to make a knowing and
9 intelligent decision as to whether to enter into plea negotiations with the Government, he respectfully
10 requests that a Pre-plea Presentence Investigation Report be prepared.

11 Mr. Cabral's counsel has spoken with the assigned AUSA, Edward Veronda, who stated that
12 he does not oppose this request.

13 Respectfully submitted,

14 WRIGHT MARSH & LEVY

15 /s/ Monti Jordana Levy
16 MONTI JORDANA LEVY, ESQ.
Attorney for Brandson Cabral

19 **ORDER**

20 IT IS HEREBY ORDERED that the United States Probation office prepare a Pre-Plea
21 Presentence Investigation Report with respect to Defendant Brandson Cabral's criminal history
22 points and corresponding criminal history.

23 DATED: January 26, 2023.

24 
25 UNITED STATES DISTRICT COURT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 25th day of January, 2023, I caused a copy of the foregoing
3 **MOTION FOR PRE-PLEA PRESENTENCE REPORT** to be served via the Court's CM/ECF
4 electronic filing system addressed to all parties on the e-service list.

5
6 BY /s/ Debbie Caroselli
7 An employee of Wright Marsh & Levy